

Mr. Jeff Eppert
Stiles Incorporated
23551 Cooper Drive
Elkhart, IN 46514

Re: 039-13564-00282
Second Administrative Amendment to
Part 70 039-7432-00282

Dear Mr. Eppert:

Stiles Incorporated was issued a Title V permit on August 31, 1999 for operation of a stationary wood molding and surface coating operation. A Significant Source Modification 039-12863-00282 to construct two (2) surface coating machines (a Patina Stain Machine and a Compo Machine) was issued on January 23, 2001. This Administrative Amendment (AA 039-13564-00282) will incorporate the source modification into the Part 70 permit and give the source approval to operate the new emission units. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (with new language bolded and old language stricken):

The responsible official in Section A.1 is being changed as requested by the source.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood molding and surface coating operation.

Responsible Official:	David L. Gawthrop, Treasurer Jeff Eppert, Plant Manager
Source Address:	23551 Cooper Drive, Elkhart, IN 46514
Mailing Address:	P.O. Box 1807, Elkhart, IN 46515
Telephone Number:	219-262-3674
SIC Code:	2499
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules

The two (2) new surface coating machines are being added to Section A.2(b) as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

(b) A wood surface coating operation, identified as EU-02, including the following:

- (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
- (2) One (1) solvent stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack F1;

- (3) One (1) fan coater application system, identified as FE-4, exhausting through Stack F4;
- (4) One (1) Paint O'Matic machine using a vacuum coating system, identified as FE-5, exhausting through Stack F5;
- (5) Two conveyor systems: one (1) conveyor servicing the Paint O'Matic, waterbased stainer, and fancoater, exhausting through Stacks F5 and FC6; the second conveyor servicing the solvent stain machine, exhausting through Stacks FC2 and FC3;
- (6) Two (2) UV coaters using vacuum coating systems, identified as FE7 and FE9, exhausting through Stacks F7.1, F7.2, F9.1, F9.2, and F9.3;
- (7) One (1) waterbased stainer using air-assisted airless spray application, identified as FE8, using dry filters for particulate control, exhausting through Stack 8-;
- (8) **One (1) Patina Stain Machine, using an airless spray application system, identified as PAO Macc, exhausting through Stack FE10; and**
- (9) **One (1) Compo Wood Molding Machine, using a flowcoating system, identified as Compo, exhausting through Stack CE1.**

The two (2) new surface coating machines are being added to the facility description in Section D.2 as follows:

Facility Description [326 IAC 2-7-5(15)]

- (b) A wood surface coating operation, identified as EU-02, including the following:
- (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
 - (2) One (1) solvent stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack F1;
 - (3) One (1) fan coater application system, identified as FE-4, exhausting through Stack F4;
 - (4) One (1) Paint O'Matic machine using a vacuum coating system, identified as FE-5, exhausting through Stack F5;
 - (5) Two conveyor systems: one (1) conveyor servicing the Paint O'Matic, waterbased stainer, and fancoater, exhausting through Stacks F5 and FC6; the second conveyor servicing the solvent stain machine, exhausting through Stacks FC2 and FC3;
 - (6) Two (2) UV coaters using vacuum coating systems, identified as FE7 and FE9, exhausting through Stacks F7.1, F7.2, F9.1, F9.2, and F9.3;
 - (7) One (1) waterbased stainer using air-assisted airless spray application, identified as FE8, using dry filters for particulate control, exhausting through Stack 8-;
 - (8) **One (1) Patina Stain Machine, using an airless spray application system, identified as PAO Macc, exhausting through Stack FE10; and**
 - (9) **One (1) Compo Wood Molding Machine, using a flowcoating system, identified as Compo, exhausting through Stack CE1.**

The Title V permit limits the VOC emissions from the surface coating operation (EU-02) to less than 247 tons per year, single HAP emissions from the surface coating operation (EU-02) to less than 9.4 tons per year and total HAP emissions from the surface coating operation (EU-02) to less than 24 tons per year. The source has agreed to maintain these limits even with the addition of the two new surface coating machines to their existing surface coating operation (EU-02).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

Operation of the new equipment incorporated into the Part 70 operating permit by this amendment may commence operation upon issuance of this approval. This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Nishat Hydari at (973) 575-2555, ext. 3216, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

NH/EVP

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Stiles Incorporated
23551 Cooper Drive
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7432-00282	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: August 31, 1999
First Administrative Amendment 039-11367-00282	Issuance Date: October 29, 1999
First Significant Source Modification 039-12863-00282	Issuance Date: January 23, 2001
Second Administrative Amendment 039-13564-00282	Pages Affected: 5, 6, 31, 31a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood molding and surface coating operation.

Responsible Official: Jeff Eppert, Plant Manager
Source Address: 23551 Cooper Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 1807, Elkhart, IN 46515
SIC Code: 2499
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) A woodworking shop, identified as EU-01, equipped with three (3) baghouse dust collectors identified as CD-01, CD-02, and CD-03 for particulate control, exhausting through Stacks D1, D2, and D3.
- (b) A wood surface coating operation, identified as EU-02, including the following:
 - (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
 - (2) One (1) solvent stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack F1;
 - (3) One (1) fan coater application system, identified as FE-4, exhausting through Stack F4;
 - (4) One (1) Paint O'Matic machine using a vacuum coating system, identified as FE-5, exhausting through Stack F5;
 - (5) Two conveyor systems: one (1) conveyor servicing the Paint O'Matic, waterbased stainer, and fancoater, exhausting through Stacks F5 and FC6; the second conveyor servicing the solvent stain machine, exhausting through Stacks FC2 and FC3;
 - (6) Two (2) UV coaters using vacuum coating systems, identified as FE7 and FE9, exhausting through Stacks F7.1, F7.2, F9.1, F9.2, and F9.3;

- (7) One (1) waterbased stainer using air-assisted airless spray application, identified as FE8, using dry filters for particulate control, exhausting through Stack 8;
 - (8) One (1) Patina Stain Machine, using an airless spray application system, identified as PAO Macc, exhausting through Stack FE10; and
 - (9) One (1) Compo Wood Molding Machine, using a flowcoating system, identified as Compo, exhausting through Stack CE1.
- (c) One (1) wood fired boiler, heat input rate 2.9 MMBtu/hr, identified as EU-03, equipped with one (1) fly ash recovery unit identified as C3 for particulate control, exhausting through Stack B1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (b) A wood surface coating operation, identified as EU-02, including the following:
- (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
 - (2) One (1) solvent stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack F1;
 - (3) One (1) fan coater application system, identified as FE-4, exhausting through Stack F4;
 - (4) One (1) Paint O'Matic machine using a vacuum coating system, identified as FE-5, exhausting through Stack F5;
 - (5) Two conveyor systems: one (1) conveyor servicing the Paint O'Matic, waterbased stainer, and fancoater, exhausting through Stacks F5 and FC6; the second conveyor servicing the solvent stain machine, exhausting through Stacks FC2 and FC3;
 - (6) Two (2) UV coaters using vacuum coating systems, identified as FE7 and FE9, exhausting through Stacks F7.1, F7.2, F9.1, F9.2, and F9.3;
 - (7) One (1) waterbased stainer using air-assisted airless spray application, identified as FE8, using dry filters for particulate control, exhausting through Stack 8-;
 - (8) One (1) Patina Stain Machine, using an airless spray application system, identified as PAO Macc, exhausting through Stack FE10; and
 - (9) One (1) Compo Wood Molding Machine, using a flowcoating system, identified as Compo, exhausting through Stack CE1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The input of VOC to all of the surface coating facilities (EU-02) shall be limited to not more than 247 tons per twelve (12) consecutive month period.
- (b) VOC input shall include any clean up solvent. The VOC content of waste shipped offsite may be deducted from the reported monthly VOC usage.
- (c) Compliance shall be demonstrated within 30 days of the end of each month based on the total ton usage for the most recent twelve (12) month period.

- (d) This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. If this permit is relied upon to issue subsequent permits, the limit cannot be relaxed without being reviewed to determine 326 IAC 2-2 and 40 CFR 52.21 applicability.
- (e) This condition replaces Operation Condition 10 from CP 039-4259-00282, issued on July 11, 1995, because:

The original condition stated "Any change or modification which may increase potential emissions to 100 tons VOC per year or 250 tons per year for any of the other criteria pollutants shall obtain an offset or PSD permit, respectively, pursuant to 326 IAC 2-3 or 326 IAC 2-2, respectively, before such change may occur." This limit was established when Elkhart County was classified as a nonattainment area for ozone. Elkhart County was reclassified in November 1994. The source has requested to have the source wide VOC limit increased to 249 tons per year. There is no change in rule applicability as a result of this increase.